

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE: WORLD TRADE CENTER  
DISASTER SITE LITIGATION  
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Docket No.: 21 MC 102 (AKH)

NOTICE OF MOTION

THIS DOCUMENT APPLIES TO ALL  
WORLD TRADE CENTER DISASTER SITE  
LITIGATION  
-----X

PLEASE TAKE NOTICE THAT upon the Declaration of Denise A. Rubin dated August 24, 2011 and the exhibits annexed thereto, this Court's Order of August 19, 2011, and pursuant to Fed. R. Civ. P. 60 (b)(1) the undersigned will request this Court to reconsider it's Order of August 22, 2011 and upon such reconsideration:

1. To amend and revise the August 19, 2011 Order, annexed at Exhibit "A", related to the allocation of costs among plaintiffs' counsel in the 21MC102 docket to read substantially as the Proposed Order annexed to these papers as Exhibit "B"; and
2. Such other and additional relief as this Court deems just and proper.


Dated: New York, New York  
August 24, 2011

Respectfully submitted,

WORBY GRONER EDELMAN & NAPOLI BERN, LLP  
Plaintiffs' Co-Liaison Counsel

  
Denise A. Rubin (DR-5591)

350 5<sup>th</sup> Avenue, Suite 7413  
New York, New York 10118  
(212) 267-3700

The motion is denied. These lawsuit, approximately 2,000  
Number, cannot be prosecuted effectively unless liaison  
counsel's direct costs are equitably shared as a server basis.  
My order of August 19, 2011 so provides. Movant's argument based  
on consensus as inequitable and partial sharing is rejected.  
8/29/11 

To:

Gregory Cannata  
The Law Firm of Gregory J. Cannata  
The Woolworth Building  
233 Broadway, 5th Floor  
New York, New York 10279

Robert Grochow  
Robert A. Grochow, P.C.  
233 Broadway, 5th Floor  
New York, New York 10279

Defendants Liaison Counsel

UNITED STATES DISTRICT COURT  
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**MOTION FOR RECONSIDERATION**

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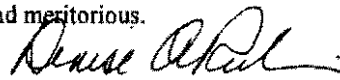
**WORBY GRONER EDELMAN & NAPOLI BERN, LLP**

*Attorneys for : numerous Plaintiffs*  
350 5<sup>th</sup> Avenue, Ste. 7413  
New York, New York 10118  
(212) 267-3700

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The undersigned attorney hereby certifies, pursuant to Fed. R. Civ. P. 11 that I have read the within papers and that to the best of my knowledge and belief they are factually correct and meritorious.



Attorney name: Denise A. Rubin (DR5591)

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**PLEASE TAKE NOTICE:**

☐ **NOTICE OF ENTRY**

that the within is a (certified) true copy of an \_\_\_\_\_ duly entered in the  
office of the clerk of the within named court on \_\_\_\_\_ 200\_\_.

☐ **NOTICE OF SETTLEMENT**

that an order \_\_\_\_\_ of which the within is a true copy, will be  
presented for settlement to the HON. \_\_\_\_\_ one of the judges of the  
within named Court, at \_\_\_\_\_ on \_\_\_\_\_ 200\_\_ at \_\_\_\_\_ O'clock \_\_\_\_M.

Dated, \_\_\_\_\_

Yours, etc.

**WORBY GRONER EDELMAN & NAPOLI BERN LLP**